



# MSD

Lees Lane  
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August 27, 1998



10401083

Ms. Liza I. Montalvo  
Remedial Project Manager  
Kentucky/Tennessee Section  
U S EPA Region IV  
61 Forsyth Street, 11th Floor  
Atlanta, GA 30303

Re: Comments in Scheduling Activities - Final Five-Year Review Report,  
Lees Lane Landfill Site, Louisville, Kentucky

Dear Ms. Montalvo:

This is in reply to your letter of July 22, 1998 containing findings and recommendations related to the final Five-Year Report for the Lees Lane Landfill Site as approved by the U. S. Environmental Protection Agency (EPA) on July 1, 1998.

In response to your requests for comments and a schedule of activities for the remainder of the current fiscal year FY99, (ending June 30, 1999) and FY 00, (ending June 30, 2000) I submit the following comments and schedule of activities chronologically in response to the recommendations contained in your letter of July 22, 1998:

1. MSD will repair, as needed, existing vehicular traffic barricades at the Lees Lane access entry. The repairs to any damaged barricades will be completed before the end of FY 99, Second Quarter, (12/31/99). However, it must be recognized that MSD cannot control vehicular access to the Lees Lane Landfill site by unauthorized trespassing vehicles because of the numerous points of entry available along the flood protection levee between the Rubbertown (chemical plant sites) area and the Mill Creek cutoff. MSD is cooperating with the Jefferson County Police to provide testimony relative to trespass on either the flood protection levee or the Lees Lane Landfill in order to help prosecute operators of unauthorized all terrain vehicles or dirt bikes.
2. MSD will continue to monitor areas of subsidence along the access road. However, a review of video tapes, made in 1992 and 1998, do not indicate any significant change in access road conditions during those past approximately six years. MSD will continue backfilling of the largest subsidence on the access road

and will substantially complete this work by the end of FY99, Second Quarter. Also, it should be noted that improved drainage facilities have been installed at the access road crossing to the shale swale as reported in the last institutional report for the Lees Lane Landfill for FY98, Fourth Quarter, (ending June 30, 1998).

3. The landfill cap and gas collection field areas are scheduled for routine mowing. However, excessive and repetitive frequent rainfall during the spring and summer of this year, 1998, has prevented the regular scheduled mowing of the Lees Lane Landfill site as well as the flood protection levee. Because of the frequency of rainfall experienced, any attempt to mow these areas would result in excessive rutting and disturbance of existing vegetation. With improved weather conditions regular mowing will be resumed during FY99.
4. MSD will continue to conduct regularly quarter inspections of the riprap lined capped bank area for any erosion effects by high water on the Ohio River. MSD has issued a purchase order to spray for control of vegetation throughout the entire riprap area of the landfill cap. It should be pointed out that, in my professional opinion, the size of riprap placed on the landfill cap area is totally and wholly inadequate. Although I am unable to confirm construction techniques employed it does not appear that the riprap was placed upon a properly installed or constructed granular base. The disturbance noted in the Five-Year Review Report only confirms the fact that the riprap of an appropriate size, approximately 200 to 300 lbs. each, should have been placed to protect the cap from excessive flow movements of the Ohio River as part of the remediation project.
5. MSD will continue to conduct quarterly institutional inspections of groundwater and gas monitoring wells to ensure that each well is locked and that vandalism has not occurred. This will be reported quarterly by the institutional inspection report furnished to your office.
6. MSD will further its efforts to conduct the necessary repairs of the gas collection system as specified in the O&M plan and Section 4.6 of the Five-Year Review Report. Investigations to date, indicate that there are some apparent low spots in the collection system which trap water and interrupt the vacuum withdrawal from the vadose zone. MSD will conduct further investigations of the condition of the gas collection system prior to the end of FY99, Second Quarter, and again prior to the end of FY99, Fourth Quarter.

Ms. Liza I. Montalvo

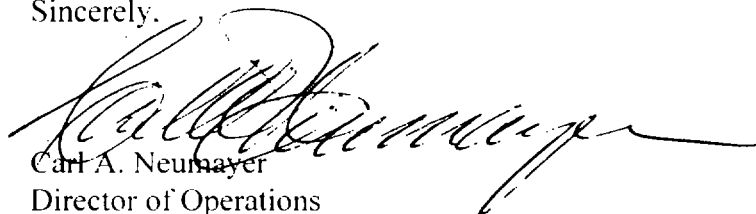
August 26, 1998

Page 3

7. MSD will investigate the condition of the Underground Storage Tank (UST) and its contents at the next institutional inspection for FY99, First Quarter. As part of the on-site sampling to be conducted during FY99, First Quarter, sampling of the UST, as requested will be performed. Pending the receipt of sampling information, MSD will arrange for the removal of the UST subject to the availability of funding during FY99. EPA will be notified of the UST removal and disposal when accomplished by MSD.
8. MSD intends to conduct monitoring of all groundwater monitoring wells as part of its routine program by the end of FY99, First Quarter. Subsequent annual monitoring of groundwater monitoring wells will then be performed annually during the first quarter of each succeeding fiscal year, starting with FY00.
9. MSD will conduct air and gas monitoring before the end of FY99, First Quarter. A second monitoring will be conducted prior to the end of FY99, Third Quarter. This proposed schedule of semi-annual air and gas monitoring will continue in succeeding fiscal years, starting with FY00, such that this monitoring will be done in the early spring and fall of each calendar year.

I would appreciate your reviewing the above schedule of activities and contacting me if you have any concerns, changes or needs for additional amplification on the activities as noted.

Sincerely,



Carl A. Neumayer  
Director of Operations

CAN/dc  
can4-7h

cc: Harold Taylor, EPA  
Bob Caplan, EPA  
Robert Pugh, KNREPC  
Gordon R. Garner, MSD  
File - WD-2 (M&M)